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June 4, 2025

Via ECF:

The Honorable Kenneth M. Karas, U.S.D.J.
 United States District Court
 Southern District of New York
 The Hon. Charles L. Brieant Jr.
 Federal Building and U.S. Courthouse
 300 Quarropas St.
 White Plains, NY 10601-4150

Re: *Minchala et al v. Jarro Contracting Co, Inc. et al*
 Civil Docket No.: 7:25-cv-01002-KMK

Dear Judge Karas:

We represent Plaintiffs in this FLSA Action, and we respectfully submit this letter motion to request a brief two-week extension of Plaintiffs' deadline to file their Motion by Order To Show Cause for a Default Judgment and damages in a sum certain ("Motion") against Jarro Contracting Co, Inc., and Fabian Jarro, individually ("Defendants").

This is Plaintiffs' second such request for an extension of time to file their Motion, the first of which was made on May 16, 2025 (ECF Dkt. No. 17), which, on May 19, 2025, the Court granted thereby extending Plaintiffs' deadline until June 6, 2025 (ECF Dkt. No. 18). A granting of this request will not prejudice any of the Defendants, who still have not responded, appeared, answered or otherwise indicated any intention of defending in this action, and to date, remain in default herein.

The reason that this second extension request is being made, is that we are still in the process of drafting the three Plaintiffs' supporting declarations and procuring their supporting materials to be submitted therewith, and it is apparent that some additional time is required to complete this process. As such, we respectfully request a two-week extension for Plaintiffs to do so and submit the Motion on the Court's docket.

A granting of this two-week extension request will also serve to afford Defendants with additional time and opportunity to retain counsel or appear on this matter, and for Defendants or any defense counsel acting on their behalf to interpose a response to the Complaint herein so that

Plaintiffs' Second Letter-Motion
June 4, 2025

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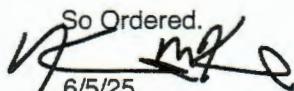
this matter may be adjudicated on its merits, rather than by a default, as Plaintiffs prefer; or failing same, for Plaintiffs to file their Motion. Moreover, a grant of this request will not affect any other scheduled date or deadline in this matter.

Should Defendants retain counsel in this matter, or contact us directly, we will promptly notify the Court of same. If this request is granted, Plaintiffs anticipate that they will be able to submit the Motion papers on or before Friday, June 20, 2025.

We thank the Court for its kind attention to this matter, and we remain available to provide any additional information.

Granted.

Respectfully Submitted,

So Ordered.

6/5/25

Avraham Scher
Avraham Y. Scher, Esq.

CC: Via Mail To:

Jarro Contracting Co, Inc., and Fabian Jarro, individually
Attn: Fabian Jarro

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